## IN THE UNITED STATES DISTRICT COURT FOR THE NOTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

KATHLEEN WILLIAMS,	)	
Plaintiff,	)	No. 07 C 6997
v.	)	Judge Lindberg
BOARD OF EDUCATION OF THE CITY OF	)	Magistrate Schenkier
CHICAGO and CHRISTINE MUNNS,	)	
INDIVIDUALLY AND AS AN AGENT OF	)	
THE DEFENDANT BOARD	)	
Defendants.	)	

## REPORT OF PARTIES PLANNING MEETING

1. **Meeting.** Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on April 15, 2008 at 125 S. Clark St. #700, and was attended by:

Elaine Siegel, Matthew Pavich for plaintiff; Sunil Kumar, James Seaberry for defendants.

- 2. **Pre-trial Schedule.** The parties jointly propose to the court the following discovery plan:
  - a. Discovery will be needed on the following subjects: 1) plaintiff's pregnancy and notification thereof to defendants; 2) defendants' supervision, observation, and evaluation of plaintiff's performance; 3) the actions in the non-renewal of plaintiff's teaching position; 4) plaintiff's claims of damages.
  - b. Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) were made by April 16, 2008. All discovery to be commenced in time to be completed by August 6, 2008.
  - c. The parties expect they will need approximately 15 depositions.
  - d. Reports from retained experts under Rule 26(a)(2)due: From plaintiff by June 15, 2008. From defendants by July 15, 2008.
  - e. Parties should be allowed until May 22, 2008 to join additional parties and to amend the pleadings.

- f. All potentially dispositive motions should be filed by August 27, 2008.
  - [Note: The court will not consider a summary judgment motion until the parties have first discussed settlement. Any motion for summary judgment must be accompanied by statement signed by lead counsel for both parties certifying that they have engaged in good faith settlement efforts.]
- Final pretrial order: Plaintiff to prepare proposed draft by October 17, g. 2008(date); parties to file joint final pretrial order by October 27, 2008.
- h. The case should be ready for trial by November 3, 2008 and at this time is expected to take approximately 5 days.
- 3. **Settlement.** At least 14 days prior to the Rule 16(b) scheduling conference, plaintiff made a written settlement demand to the defendants. At least 7 days prior to the scheduling conference defendants responded to the plaintiff's settlement demand.
- 4. **Consent.** Parties do not consent unanimously to proceed before a Magistrate Judge.

Respectfully submitted, PATRICK J. ROCKS General Counsel

By: s/James J. Seaberry James J. Seaberry **Assistant General Counsel** 

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s/Sunil Kumar

s/Elaine Siegel Elaine K.B. Siegel & Associates, P.C. 39 S. LaSalle Street, Suite 617 Chicago, IL 60603